



Todd R. G. Hill
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In Propria Persona

UNITED STATES DISTRICT COURT FOR
THE CENTRAL DISTRICT OF CALIFORNIA

WESTERN DIVISION

TODD R. G. HILL, et al,

Plaintiffs

vs.

**THE BOARD OF DIRECTORS,
OFFICERS AND AGENTS AND
INDIVIDUALS OF THE PEOPLES
COLLEGE OF LAW, et al.,**

Defendants.

CIVIL ACTION NO. 2:23-cv-01298-JLS-BFM

The Hon. Josephine L. Staton
Courtroom 8A, 8th Floor

Magistrate Judge Brianna Fuller Mircheff
Courtroom 780, 7th Floor

**PLAINTIFF'S NOTICE OF SUBMISSION OF
PROPOSED FIFTH AMENDED
COMPLAINT AND PRESERVATION OF
RULE 59(E) MOTION**

NO ORAL ARGUMENT REQUESTED

**PLAINTIFF'S NOTICE OF SUBMISSION OF PROPOSED FIFTH AMENDED
COMPLAINT AND PRESERVATION OF RULE 59(E) MOTION**

CASE 2:23-CV-01298-JLS-BFM

**NOTICE OF SUBMISSION OF PROPOSED FIFTH AMENDED COMPLAINT AND
PRESERVATION OF RULE 59(e) MOTION**

TO THE HONORABLE COURT AND ALL PARTIES OF RECORD:

Plaintiff Todd R.G. Hill respectfully submits the attached Proposed Fifth Amended Complaint in response to arguments raised in Defendants' pending motions to dismiss under Federal Rule of Civil Procedure 12(b)(6), including Docket Nos. 263 and 270. This submission is made to streamline the record and provide a clarified operative pleading that more precisely articulates the legal and factual basis for Plaintiff's claims.

This notice is submitted without waiver of Plaintiff's pending Rule 59(e) motion (Docket No. 262), which remains unresolved. Plaintiff continues to preserve all procedural objections raised therein, including those related to (a) the docketing and premature consideration of dispositive motions while judicial notice filings or other material filings remain pending, and (b) the unauthorized post-dismissal filing by the State Bar of California (Docket No. 308).

The Proposed Fifth Amended Complaint does not assert new causes of action, but rather:

- 1. Further clarifies factual allegations supporting predicate acts and legal elements;**
- 2. Elaborates Rule 9(b) allegations as appropriate to enhance particularity without waiver;**
- 3. Improves narrative structure and factual specificity consistent with federal pleading standards;**
- 4. Incorporates refinements made in good faith response to arguments raised in Defendants' motions, while expressly preserving Plaintiff's position that the Fourth**

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Amended Complaint was legally sufficient and satisfied the applicable standards under Rule 8, 9(b) and 12(b)(6).

Plaintiff submits this complaint in the interest of judicial economy and consistent with the Court's discretion to permit amendment under Rule 15(a)(2) or to grant post-judgment relief under Rule 59(e). Plaintiff respectfully requests that, should the Court grant relief under Rule 59(e) or determine that further amendment would promote judicial efficiency and fair adjudication, the attached Proposed Fifth Amended Complaint be deemed the operative pleading for all further proceedings.

Plaintiff further notes that the Proposed Fifth Amended Complaint was prepared in direct response to the legal and factual arguments raised in Defendants' motions to dismiss, and is intended to promote judicial economy by narrowing and clarifying the record. This amendment introduces no new causes of action and causes no undue delay or prejudice to any Defendant. Instead, it reflects Plaintiff's effort to cure perceived deficiencies raised by Defendants and the Court without burdening the Court with unnecessary motion practice.

A redline comparison showing the differences between the Fourth and Fifth Amended Complaints is available upon request or may be filed as a supplemental exhibit at the Court's direction.

Respectfully submitted,

Dated: May 19, 2025

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Todd R. G. Hill
Plaintiff, Pro Se

STATEMENT OF COMPLIANCE WITH LOCAL RULE 11-6.1

The undersigned party certifies that this brief contains 417 words, which complies with the 7,000-word limit of L.R. 11-6.1.

Respectfully submitted,



May 19, 2025
Todd R.G. Hill
Plaintiff, in Propria Persona

Plaintiff's Proof of Service

This section confirms that all necessary documents will be properly served pursuant to L.R. 5-3.2.1 Service. This document will be/has been electronically filed. The electronic filing of a document causes a "Notice of Electronic Filing" ("NEF") to be automatically generated by the CM/ECF System and sent by e-mail to: (1) all attorneys who have appeared in the case in this Court

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1 and (2) all pro se parties who have been granted leave to file documents electronically in the case
2 pursuant to L.R. 5-4.1.1 or who have appeared in the case and are registered to receive service
3 through the CM/ECF System pursuant to L.R. 5-3.2.2. Unless service is governed by Fed. R. Civ. P.
4 4 or L.R. 79-5.3, service with this electronic NEF will constitute service pursuant to the Federal
5 Rules of Civil Procedure, and the NEF itself will constitute proof of service for individuals so served.
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7 Respectfully submitted,
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12 May 19, 2025
13 Todd R.G. Hill
14 Plaintiff, in Propria Persona
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